

REMARKS

The Office Action dated November 22, 2005, has been received and carefully considered. Entry of the amendments to claims 1, 2, 4, 9, 12, 15 and 18 is respectfully requested. Claim 8 is canceled without prejudice or disclaimer. Reconsideration of the outstanding objections/rejections in the present application is also respectfully requested based on the following remarks.

Drawing Objections

Applicant respectfully submits herewith a Replacement Sheet adding the previously omitted reference number 100 to Figure 1. Approval is respectfully requested.

Claim Objections

Claims 1, 4, 12 and 15 stand objected to for informalities. Applicant has incorporated the Examiner's suggestion to add "the" in the appropriate places before "receiver information." Applicant has also hyphenated "processor-readable" as requested. In addition, Applicant has amended claims 2, 9 and 18 to conform with the suggested addition of "the" before "receiver information."

35 U.S.C. § 112 Rejections

Claims 7, 14 and 20 stand rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the

enablement requirement. Specifically, the Examiner asserts that "operating 'according to a multicast source notification of interest protocol' ... [is not described] in such a way as to enable one skilled in the art as to what comprises, or how to implement, such a 'multicast source notification of interest protocol.'" Office Action, para. 4. Applicant respectfully traverses.

As an initial matter, Applicant respectfully submits that Multicast Source Notification of Interest Protocol (MSNIP) was a known protocol at the time of Applicant's filing. Thus, one skilled in the art at the time of the invention would have known what comprises MSNIP and how to implement the disclosed invention according to MSNIP.

In addition, Applicant respectfully submits that Applicant's specification discloses sufficient additional information regarding MSNIP that one skilled in the art would be able to make and use the claimed invention. For example, Applicant's Background of the Invention (pages 1-2) discloses that MSNIP may support at least three types of messages (Group Map, Interest Solicitation, Receiver Report), that host that wishes to be managed by MSNIP may periodically send an Interest Solicitation message, that messages may be multicast to an ALL_IGMPv3_ROUTERS group address and several other details of

MSNIP. Applicant respectfully submits that claims 7, 14 and 20 are enabled in view of the facts that MSNIP was known at the time of filing and that Applicant has disclosed several details regarding MSNIP. Applicant respectfully requests that the rejections be withdrawn.

Claim Rejections 35 U.S.C. § 101

Applicant has canceled claim 8 without prejudice or disclaimer. Applicant respectfully submits the rejection of claim 8 is moot.

Claim Rejections 35 U.S.C. § 103

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,614,787 ("Jain"). Applicant respectfully traverses these rejections for at least the reasons that Jain fails to disclose each feature recited in the claims and the Examiner has failed to provide motivation as to why one of ordinary skill in the art would have been motivated to modify Jain.

As admitted by the Examiner, Jain does not disclose multicasting a single message to a group address. Office Action, p. 5. In addition, Applicant respectfully submits that Jain also does not disclose aggregating the plurality of respective records into a single message. Jain discloses that intermediate device 204 (a switch -- col. 6, lines 6-8)

"combines or aggregates" the multicast registration information. Col. 7, lines 55-60. This aggregated information is a new virtual VID. Col. 8, lines 3-10. The VID is not a message, but an address for the switch 204 to send multicast messages when they arrive. In contrast, Applicant's claims recite "aggregating the plurality of respective records into a single message" and "multicasting the single message to a group address." Applicant respectfully submits that the rejection is improper for at least this reason.

In addition, Applicant respectfully submits that the Examiner has not provided proper motivation to modify Jain. The stated reason is that it would have been obvious in order to provide a database (of aggregated VID's) at various other locations. Office Action, p. 5-6. However, even if one were to desire to provide a database of VID's at various locations, the Examiner has not provided a motivation for why the database would be provided at various locations by sending the database via a multicast of a single message. Of course, Jain does not disclose sending the database via any sort of message and the Examiner has not provided a motivation why one of ordinary skill would do so either. For at least this reason, Applicant respectfully submits that the rejections are improper and requests that they be withdrawn.

Each of the independent claims recite similar or analogous features as those discussed above. For at least this reason the rejection of each independent claim is improper and Applicant respectfully requests that the rejections be withdrawn. Likewise, the dependent claims contain the features recited in each independent claim and their rejection is improper for at least this reason. Applicant respectfully requests that the rejections of the dependent claims also be withdrawn.

CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

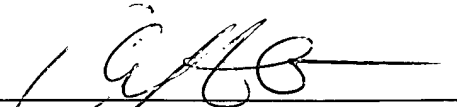
Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Patent Application
Attorney Docket No.: 57983.000067
Client Reference No.: 14979BAUS01U

Respectfully submitted,

Hunton & Williams LLP

By:


Christopher Cuneo
Registration No. 42,450 for,
Thomas E. Anderson
Registration No. 37,063

Hunton & Williams LLP
1900 K Street, N.W.
Washington, D.C. 20006-1109
Telephone: (202) 955-1500
Facsimile: (202) 778-2201

Date: February 22, 2006